

VIRGINIA:

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

FILED

2010 JUL 21 P 2:07
CLERK
US BANKRUPTCY COURT
ALEXANDRIA DIVISION

In re: OASIS VINEYARD, INC.)

Debtor)

v.)

TAREQ SALAHI)

Intervener)

CASE NO. 08-17750-RGM
Chapter 7

MOTION TO DISMISS OR STAY

COMES NOW the Intervener, Tareq Salahi, pro se, seeking to intervene in this matter, as an individual officer, shareholder, and “alleged former” member of the Board of Directors of Oasis Vineyards, Inc., and to move this Honorable Court to dismiss these proceedings, or at least stay them as this bankruptcy was filed without the proper authority to make such filing as I hold the power of attorney for Dirgham Salahi, a necessary vote to decide to file in bankruptcy, and I did not agree or consent to use that power of attorney to vote for this bankruptcy filing, and this issue, regarding the capacity to exercise Dirgham Salahi’s power of attorney, is now pending in Fauquier County Circuit Court and scheduled for trial in September 2010; in support of this motion to dismiss or stay these proceedings, because of this threshold question, whether this filing is an apt one, I add the following statement of facts:

1. I am the Majority Shareholder of Oasis Vineyards, Inc. & Salahi Family Ltd.

Partnership, by and through an exclusive power of attorney from Dirgham Salahi; Corrinne

Salahi, my mother may try later to dispute this fact, but the Court has not resolved her alleged dispute; this matter however was in fact previously disputed in court once before but then was settled, resolving the issue, in my mind, in favor of the power of attorney that I hold for my father;

2. On information and belief, my mother, Corinne Salahi has mis-represented that she had the authority to file this bankruptcy as it was dependent on using a power of attorney that she insist is legitimate but that is indisputably the subject of contention in the Fauquier Circuit Court.
3. I only learned of the Bankruptcy Trustee on or about April 2010.
4. I notified the Trustee that the Bankruptcy filing was flawed as my mother lacked the authority to file in bankruptcy without my signature and in addition to, my power of attorney, for my father, Dirgham Salahi.
5. In a recent deposition in the Fauquier Circuit Court matter, my mother, Corinne Salahi confessed under oath that she failed to call a board meeting at anytime regarding any alleged Bankruptcy filing.
6. She further confessed under oath that she filed without ever consulting with me.
7. Corinne Salahi had a fiduciary duty to the other owners of Oasis Vineyards, Inc to conform with ordinary process, the state law, and to respect, at the least, that there was a dispute about who exercised the power of attorney for Dirgham Salahi.
8. Indeed, the bankruptcy filing may have compromised the wine business beyond repair.
9. Corinne Salahi is not an expert in the wine business and has done nothing to


preserve the wine and equipment that is the bulk of the estate in bankruptcy; Ms. Salahi, who is solely responsible for this bankruptcy, and the only person improperly entrusted with access to the property by the trustee, works as an overseer and director of a Montessori School of Alexandria.

10. Because Ms. Salahi doesn't know what she's doing, and neither does the Trustee Mr. McCarthy, nor his agent, Mr Nick Arrington, the assets of Oasis Vineyards, Inc have been diminished if not entirely wasted by allowing the wines in the holding tanks to spoil without tending to them, and thus causing hundreds of thousands of dollars of damage; at one point I offered to be of assistance but was rebuked, and told that Ms. Salahi was in charge.
11. Mr. Nick Arrington has chain locked all doors to the winery business, and on several occasions, the Trustee has taken steps so I may have some access but no control over the winery in order to save the despoiling assets.
12. I have of course informed Mr. McCarthy & Mr. Arrington that it is vital to immediately "gas" the wine tanks and do necessary cleaning so we may preserve the wine however, and I don't mean this too critically, they don't know whether to credit my concern or not.
13. After I offered to top off the wine tanks with CO2 or other gasses to preserve the wines, the Bankruptcy Trustee refused to allow me in the winery for that purpose. I have completed advance study at the world famous University of California, Davis in Enology (science of winemaking) and been responsible for the winery prior to the trustees surprise involvement.

14. Wine Expert Louizos Papadopoulos, who owns two other wineries in the Blue Ridge WineWay local district adjacent to Oasis has confirmed that gassing the wines was an important process and should have been occurring on a regular basis during the spring & summer; I'm sure I could make him available to the court to confirm, if this protocol is not implemented, the wine will be permanently lost if not already destroyed. Time is of essence.
15. I have worked my family vineyard without compensation since the summer of 2007.
16. The wine vintages are currently in the aging process, requiring cleaning and biochemical assistance in the next several weeks; failure to act shall likely result in the ruining of entire vintages.

WHEREFORE, we respectfully requests that the Court expel this fraudulently bankruptcy or place on immediate stay on any improper Bankruptcy filing done by a minority shareholder.

Respectfully submitted,



Tareq Salahi
Majority Shareholder
Oasis Vineyards, Inc.
Salahi Family Ltd. Partnership

CERTIFICATE

I hereby certify that I have delivered via email or facsimile and first class mail when above known, postage prepaid, a true and exact copy of the foregoing on the this 20th day of July, 2010 to:

Corinne Salahi – Minority Shareholder
14141 Hume Road
Hume, Virginia, 22639

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